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November 29, 2018

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia SC 29210

Re: Application of Horry Telephone Cooperative, Inc. for an Expansion of
its Certificate of Public Convenience and Necessity to Provide Local
Exchange and Exchange Access Services to Customers Located in
Certain Areas of the State of South Carolina

Dear Ms. Boyd:

Please find enclosed for filing on behalf of Horry Telephone Cooperative, Inc. ("HTC"), a Motion for Protective Treatment of Financial Statements as it relates to the Application for an Expansion of its Certificate of Public Convenience and Necessity to Provide Local Exchange and Exchange Access Service to Customers Located in Certain Areas of the State of South Carolina filed by HTC. A copy of the confidential information is being provided along with this Motion under seal, and a public, redacted version was filed with the Application in this matter.

Thank you for your assistance.

Sincerely,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:khh

Enclosure: as stated

cc: Jeffrey M. Nelson, Esq.

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BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-__-C

IN RE:

Application of Horry Telephone Cooperative, Inc. for an)
Expansion of its Certificate of Public Convenience and)
Necessity to Provide Local Exchange and Exchange Access)
Service to Customers Located in Certain Areas of the State)
of South Carolina)
_____)

**MOTION FOR PROTECTIVE TREATMENT AND BASIS FOR FILING EXHIBIT B
TO APPLICATION AS A TRADE SECRET**

Horry Telephone Cooperative, Inc. ("HTC" or "Applicant"), by its attorneys and pursuant to S.C. Code Ann. § 39-8-10, *et seq.*, Commission Order No. 2005-226, and other applicable rules and regulations of the Public Service Commission of South Carolina (the "Commission"), respectfully requests that the Commission grant protective treatment of its Annual Report, which is provided as Exhibit B to its Application for an Expansion of its Certificate of Public Convenience and Necessity in the above-captioned proceeding ("Application"). Because this Motion is an inseparable part of the Application, it is being filed concurrently with the Application. In support of this Motion, Applicant provides the following:

1. The name and address of the Applicant are as follows:

Horry Telephone Cooperative, Inc.
P.O. Box 1820
3480 Hwy 701 N.
Conway, SC 29528-1820

2. All correspondence, notices, inquiries and other communications regarding this application should be sent to:

M. John Bowen, Jr.
 Margaret M. Fox
 McNair Law Firm, P.A.
 Post Office Box 11390
 Columbia, South Carolina 29211
 Telephone: (803) 799-9800
 Email: jbowen@mcnair.net; pfox@mcnair.net

I. Description of Confidential Information

3. By its Application, HTC seeks an expansion of its authority to provide local exchange and exchange access service to customers in the State of South Carolina. As evidence of its financial ability to provide the services for which it seeks certification, and as required by S.C. Code Ann. § 58-9-280(B)(1), HTC has attached to its Application as Exhibit B its Telecommunications Company Annual Report for Calendar Year 2017. This Annual Report was filed on a confidential basis with the Commission and the Office of Regulatory Staff (“ORS”). This report contains confidential and proprietary information, the public disclosure of which may result in direct, immediate and substantial harm to the competitive position of HTC in South Carolina.

II. Grounds for Claim of Confidentiality

4. The commercial business and financial information submitted by Applicant in Exhibit B to its Application constitutes a “trade secret” as defined in the South Carolina Trade Secrets Act, S.C. Code Ann. § 39-8-10, *et seq.* The Annual Report contains confidential and commercially-sensitive information. Applicant derives independent economic value from the fact that significant, detailed and proprietary information regarding its business operations and finances is unknown to its competitors. Public disclosure of this information would harm Applicant’s ability to compete in the provision of competitive telecommunications services in South Carolina.

Additionally, the information contained in the Annual Report is not readily available to the public, and Applicant takes reasonable efforts under the circumstances to maintain its secrecy. When required to submit this information to public authorities, all such information is clearly marked “confidential.” By its directive dated April 28, 2010 in Docket No. 2008-184-A, the Commission granted confidential treatment to competitively sensitive information that is filed in the standardized Annual Reports by all of the companies that request such treatment.

5. Applicant clarifies that its request for protection applies only to the Annual Report attached as Exhibit B to the Application. Application is not seeking protection by means of this Motion for any other reports Applicant may be required to file with the Commission or ORS should the relief in the Application be granted.

III. Conclusion

6. The information contained in the Annual Report included in support of the Application, for which confidential treatment is requested, is both proprietary and competitively sensitive. Applicant would suffer direct and substantial harm if such information were made publicly available. The harm that would result from public disclosure of Applicant’s proprietary business information is real and not speculative.

WHEREFORE, Horry Telephone Cooperative, Inc. respectfully requests that the Commission grant this Motion for Protective Treatment of the Telecommunications Company Annual Report provided as Exhibit B to its Application for an Expansion of its Certificate of Public Convenience and Necessity and filed under seal in this proceeding, and grant such other relief as is just and proper.

Respectfully submitted,

A handwritten signature in cursive script, reading "Margaret M. Fox", written in dark ink.

M. John Bowen, Jr.

Margaret M. Fox

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Attorneys for Horry Telephone Cooperative, Inc.

November 28, 2018